

Timothy M. Bechtold
BECHTOLD LAW FIRM, PLLC
P.O. Box 7051
Missoula, MT 59807
406-721-1435
tim@bechtoldlaw.net

Constance Van Kley
Rylee Sommers-Flanagan
UPPER SEVEN LAW
P.O. Box 31
Helena, MT 59624
406-306-0330
constance@uppersevenlaw.com
rylee@uppersevenlaw.com

Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

ALOYSIUS D. BLACK CROW, et al.,)	CV 21-97-M-DWM
individually and on behalf of all other)	
persons similarly situated,)	
)	
Plaintiffs,)	NOTICE OF
)	INDIVIDUAL CLAIMS
v.)	
)	
LAKE COUNTY, MONTANA; BILL BARRON;)	
STEVE STANLEY; GALE DECKER; KATE)	
STINGER; DONALD BELL, BEN WOODS,)	
and DOES 1-10,)	
)	
Defendants.)	

Concurrent with this notice, Plaintiffs have filed their putative Consolidated Class Action Complaint. The Complaint addresses common allegations related to conditions of confinement at the Lake County Jail. The following individual claims are not superseded by the Consolidated Class Action Complaint but share common factual and legal issues and will be pursued on Plaintiffs' behalf by counsel in each listed individual case:

- Plaintiff James Elverud, No. 9:21-cv-00123-DWM, has alleged individual claims arising from the jail's negligent classification and the jail's failure to protect him from assault and failure to provide medical care.
- Plaintiff Stoney Corcoran, No. 9:21-cv-00124-DWM, has alleged individual claims arising from the jail's failure to accommodate his disability and failure to provide medical care.
- Plaintiff Shaun Robertson, No. 9:21-cv-00125-DWM, has alleged individual claims arising from the jail's failure to provide medical and dental care.
- Plaintiff Dominic Martinez, No. 9:21-cv-00132-DWM & 9:22-cv-00025-DWM, has alleged individual claims arising from exposure to chemicals at the jail.
- Plaintiff Kalem Jay Branson, No. 9:22-cv-00002-DWM, has alleged individual claims arising from damages caused by the failure to provide medical care.

- Plaintiff Donald McLeod, No. 9:22-cv-00009-DWM, has alleged individual claims arising from the jail's failure to provide medical care and injuries caused by the inadequate conditions of confinement described in the consolidated class action complaint.
- Plaintiff Dwayne Turner, No. 9:22-cv-00021-DWM, has alleged individual claims arising from the jail's failure to provide adequate medical care.
- Plaintiff Christopher M. Brown, No. 9:22-cv-00024-DWM, has alleged individual claims arising from the jail's failure to credit the full amount of cash brought to the jail to Plaintiff Brown's account.
- Plaintiff Joseph Brown, No. 9:22-cv-00025-DWM, has alleged individual claims arising from exposure to chemicals at the jail.
- Plaintiff Marcus Azure, No. 9:22-cv-00030-DWM, also brings an individual claim arising from an injury caused by a broken bunk and the subsequent prosecution of him for damaging jail equipment.
- Plaintiff Jacob Birdsley, No. 9:22-cv-00062-DWM, has alleged individual claims arising from the jail's failure to provide adequate medical care and to provide a medically appropriate diet.

**

The following plaintiffs have alleged claims arising from their criminal proceedings. Such claims do not involve common questions of law and fact, but counsel may create procedural hurdles for the individual plaintiffs by dismissing or by not prosecuting them. Counsel therefore will allow the following plaintiffs to pursue their claims regarding their underlying criminal proceedings individually and without the assistance of counsel:

- Plaintiff Aloysius Black Crow, No. 9:21-cv-00097-DWM.
- Plaintiff Tyler F. Erickson, No. 9:21-cv-00122-DWM.
- Plaintiff James R. Elverud, No. 9:21-cv-00123-DWM.
- Plaintiff Tony Marvin Doyle, No. 9:22-cv-00001-DWM.

Dated March 28th, 2022.

/s/Timothy M. Bechtold
BECHTOLD LAW FIRM

/s/Constance Van Kley
UPPER SEVEN LAW

Attorneys for Plaintiffs